

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RAJENDER K. SALGAM, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	<b>Case No. 1:18-cv-00029 (AJT-TCB)</b>
ADVANCED SOFTWARE	)	
SYSTEMS, INC.,	)	
	)	
Defendant.	)	
	)	

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**MOTION TO COMPEL**

Pursuant to Federal Rule 37 and Local Rule 37, Defendant Assyst Software Systems, Inc. (“Assyst”) respectfully submits this Memorandum in Support of its Motion to Compel plaintiff Manasamy Kandasamy to respond to Assyst’s Requests 25, 26, and 27. A corresponding Memorandum, Notice of Hearing, and Proposed Order are being submitted with this Motion.

Moreover, counsel certifies that a good faith effort has been made between counsel to resolve the discovery matters at issue without court action.

WHEREAS Assyst requests that this Court order (1) that Kandasamy fully and completely respond to Assyst’s Requests for Production 25, 26, and 27, promptly and no later than September 19, 2018, (2) that Kandasamy pay Assyst’s reasonable attorney’s fees and costs incurred in pursuing this Motion, (3) that discovery be kept open so that the ordered production may be made and so that Kandasamy’s deposition may be continued for the limited purpose of addressing issues relevant to the ordered production, and (4) that Assyst be granted all other relief deemed just and proper by this Court.

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 7, 2018, I served the foregoing document via electronic mail to:

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